



DEPARTMENT OF THE AIR FORCE
HEADQUARTERS AIR FORCE SPACE COMMAND

8 August 2002

MEMORANDUM FOR AFSPC CONS/CCs
SMC/PK
AFSPC Small Business Specialists

FROM: HQ AFSPC/LGC
150 Vandenberg St Ste 1105
Peterson AFB CO 80914-4350

SUBJECT: Info. Ltr 2002-04, Guidance on SF 294s (Subcontracting Report for Individual Contracts) and SF 295s (Summary Subcontracting Report) for AFSPC Contracts

1. The following information contained in INFO. LTR-2002-04 is directive in nature with respect to how subcontracting information shall be reported on AFSPC contracts with individual subcontracting plans.
2. Because of recent confusion regarding the use of these forms, submission of copies to HQ AFSPC/LGCM and proper completion of the forms, we are issuing this policy letter.
3. SF 295s (Summary Subcontract Report). Contractors are required to submit summary subcontracting reports semi-annually (30 days after 31 Mar and 30 Sep). The report summarizes small business (SB) subcontracting on all the DoD prime contracts held by the particular profit center with which you have a contract. The contractor may submit the report to either Defense Contract Management Agency (DCMA) or to any contracting officer (CO) of DoD if there are no DCMA -administered contracts for that profit center. If your contractor has at least one contract administered by DCMA, it will most likely submit the report to DCMA. If the contractor chooses to submit the report to an AFSPC CO, then please forward the SF 295 to HQ AFSPC/LGCM. The SF 295 will be forwarded to SAF/SB who enters the data into a database which is reported to Congress. It is important to obtain and forward these reports to HQ AFSPC promptly (no later than 5 May and 5 Nov) as DoD keeps the database open for data entry by DoD agencies only until 15 May and 15 Nov, respectively, for each reporting period.
4. SF 294s (Subcontracting Report for Individual Contracts). Contractors are required to submit individual contract reports semi-annually (30 days after 31 Mar and 30 Sep). If you have a service contract that has a term other than Sep to Oct, instruct the contractor to report semi-annually (SF 294) at the midpoint and completion of each "contract year."

a. Whether or not the contract is administered by DCMA, the contractor submits the original report to the CO of the contracting office with a copy to DCMA, if contract administration is delegated (reference reverse of SF 294). It is AFSPC policy that even when the contract is delegated to DCMA for administration, that the AFSPC CO is aware of and monitors SB subcontracting performance by the prime contractor and participate in any "good faith" determinations required by FAR 19.705-7(c).

b. After checking the SF 294s for accuracy (especially that goals match the contract requirements and "actual cumulative" numbers comply with subparagraph c below), provide copies of the semi-annual SF 294s to HQ AFSPC/LGCM by 5 May or 5 Nov, as applicable. We ask for the SF 294s because we keep metrics on how well AFSPC contractors meet their SB subcontracting commitments. This is in response to general criticism from SB firms that the AF does not do a good job of enforcing subcontracting goals.

c. "Current goal" and "actual cumulative." The "SB Subcontracting Plan" clause at FAR 52.219-9(c) requires contracts containing options to separately show goals for the basic and option periods, while the SF 294 form asks the contractor to compare "current goals" with "actual cumulative." In order to do a comparative analysis using like-data, the dollars and percentages shown under the "current goal" should be the cumulative amount since the inception of the contract (for example, in a basic plus four option year contract, if you were in the second option year, your report would show the cumulative total for the basic year plus the two option years in the "current goal" column). The "actual cumulative" column will, likewise, reflect total subcontract achievements from the inception of the contract through the date of the report shown in Block 4.

d. For contracts without options, "goals" and "actuals" are for the entire contract, not current year data.

e. Note that only first tier subcontracting data is reported (reference paragraph 7, reverse of SF 294).

f. Exceptions: SF 294s are not required for commercial item contracts that have a commercial plan and contracts under the Comprehensive Subcontracting Plan test program of DFARS 219.702 (reference reverse of SF 294, paragraph 2).

g. Block 17, Remarks, and a continuation sheet can be used to provide additional information for the CO which the contractor feels is necessary to explain those areas where it fell short in meeting goals. This information assists the CO to make their good faith determination.

5. Cooperative effort. We believe the SB subcontracting plan monitoring of contractor performance and the processing of SF 294s/295s to be a cooperative effort between AFSPC SBSs and AFSPC COs. While the FAR places responsibility with COs, the

SBSs can assist with the process, especially with taking action with contractors who are not meeting goals and reviewing facts and circumstances leading to a good faith/not good faith determination. All SF 294s must be reviewed by the unit small business specialist prior to submittal to HQ AFSPC/LGCM. SBSs may also share source lists with prime contractors.

6. It is important that contractors use the latest editions of the SF 294/295 (currently Sep 2001) which may be obtained at a GSA website, specifically

[http://contacts.gsa.gov/webforms.nsf/\(formslist\)?openform&count=1000&category=Standard+Forms&expandview](http://contacts.gsa.gov/webforms.nsf/(formslist)?openform&count=1000&category=Standard+Forms&expandview)

7. If you need subcontracting award data for an individual contract on an annual basis (e.g., for award fee purposes), you may include a Contract Data Requirements List (CDRL), DD 1423, to the contract. Please see attachment below for a sample CDRL or you may view it on the AFSPC Contracting Home Page at:


<http://www.spacecom.af.mil/hqafspc/contracting/>

Select: Small Business

Select: Sample Solicitation and Award Fee Language, for Enhanced Small Business Subcontracting

Select the icon on page two

8. If you have questions, please contact Margaret Gillam, HQ AFSPC/LGCM, DSN 692-2652 or margaret.gillam@peterson.af.mil.


STEPHEN G. SMITH, Col, USAF
Chief, Contracting Division

Attachment:

1. Sample CDRL for Small Business Subcontracting Data Status Report



"DD1423 for SubK
Data Sep01.pdf"

CONTRACT DATA REQUIREMENTS LIST (1 Data Item)										Form Approved OMB No. 0704-0188													
The public reporting burden for this collection of information is estimated to average 110 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden, to Department of Defense, Washington Headquarters Services, Directorate for Information Operations and Reports (0701-0188), 1215 Jefferson Davis Highway, Suite 1204, Arlington, VA 22202-4302. Respondents should be aware that notwithstanding any other provision of law, no person shall be subject to any penalty for failing to comply with a collection of information if it does not display a currently valid OMB control number. Please DO NOT RETURN your form to the above address. Send completed form to the Government Issuing Contracting Officer for the Contract/PR No. listed in Block E.																							
A. CONTRACT LINE ITEM NO.				B. EXHIBIT			C. CATEGORY: TDP _____ TM _____ OTHER _____																
D. SYSTEM/ITEM					E. CONTRACT/PR NO.				F. CONTRACTOR														
1. DATA ITEM NO.		2. TITLE OF DATA ITEM						3. SUBTITLE															
4. AUTHORITY (Data Acquisition Document No.)					5. CONTRACT REFERENCE				6. REQUIRING OFFICE														
7. DD 250 REQ		9. DIST STATEMENT REQUIRED		10. FREQUENCY		12. DATE OF FIRST SUBMISSION		14. DISTRIBUTION															
8. APP CODE				11. AS OF DATE		13. DATE OF SUBSEQUENT SUBMISSION		a. ADDRESSEE		b. COPIES Draft Final Reg Repro													
16. REMARKS																							
																				15. TOTAL →			
										G. PREPARED BY					H. DATE		I. APPROVED BY					J. DATE	

17. PRICE GROUP

18. ESTIMATED
TOTAL PRICE

INSTRUCTIONS FOR COMPLETING DD FORM 1423

(See DoD 5010.12-M for detailed instructions.)

FOR GOVERNMENT PERSONNEL

Item A. Self-explanatory.

Item B. Self-explanatory.

Item C. Mark (X) appropriate category: TDP - Technical Data Package; TM - Technical Manual; Other - other category of data, such as "Provisioning," "Configuration Management," etc.

Item D. Enter name of system/item being acquired that data will support.

Item E. Self-explanatory (to be filled in after contract award).

Item F. Self-explanatory (to be filled in after contract award).

Item G. Signature of preparer of CDRL.

Item H. Date CDRL was prepared.

Item I. Signature of CDRL approval authority.

Item J. Date CDRL was approved.

Item 1. See DoD FAR Supplement Subpart 4.71 for proper numbering.

Item 2. Enter title as it appears on data acquisition document cited in Item 4.

Item 3. Enter subtitle of data item for further definition of data item (optional entry).

Item 4. Enter Data Item Description (DID) number, military specification number, or military standard number listed in DoD 5010.12-L (AMSDL), or one-time DID number, that defines data content and format requirements.

Item 5. Enter reference to tasking in contract that generates requirement for the data item (e.g., Statement of Work paragraph number).

Item 6. Enter technical office responsible for ensuring adequacy of the data item.

Item 7. Specify requirement for inspection/acceptance of the data item by the Government.

Item 8. Specify requirement for approval of a draft before preparation of the final data item.

Item 9. For technical data, specify requirement for contractor to mark the appropriate distribution statement on the data (ref. DoDD 5230.24).

Item 10. Specify number of times data items are to be delivered.

Item 11. Specify as-of date of data item, when applicable.

Item 12. Specify when first submittal is required.

Item 13. Specify when subsequent submittals are required, when applicable.

Item 14. Enter addressees and number of draft/final copies to be delivered to each addressee. Explain reproducible copies in Item 16.

Item 15. Enter total number of draft/final copies to be delivered.

Item 16. Use for additional/clarifying information for Items 1 through 15. Examples are: Tailoring of documents cited in Item 4; Clarification of submittal dates in Items 12 and 13; Explanation of reproducible copies in Item 14.; Desired medium for delivery of the data item.

FOR THE CONTRACTOR

Item 17. Specify appropriate price group from one of the following groups of effort in developing estimated prices for each data item listed on the DD Form 1423.

a. Group I. Definition - Data which is not otherwise essential to the contractor's performance of the primary contracted effort (production, development, testing, and administration) but which is required by DD Form 1423.

Estimated Price - Costs to be included under Group I are those applicable to preparing and assembling the data item in conformance with Government requirements, and the administration and other expenses related to reproducing and delivering such data items to the Government.

b. Group II. Definition - Data which is essential to the performance of the primary contracted effort but the contractor is required to perform additional work to conform to Government requirements with regard to depth of content, format, frequency of submittal, preparation, control, or quality of the data item.

Estimated Price - Costs to be included under Group II are those incurred over and above the cost of the essential data item without conforming to Government requirements, and the administrative and other expenses related to reproducing and delivering such data item to the Government.

c. Group III. Definition - Data which the contractor must develop for his internal use in performance of the primary contracted effort and does not require any substantial change to conform to Government requirements with regard to depth of content, format, frequency of submittal, preparation, control, and quality of the data item.

Estimated Price - Costs to be included under Group III are the administrative and other expenses related to reproducing and delivering such data item to the Government.

d. Group IV. Definition - Data which is developed by the contractor as part of his normal operating procedures and his effort in supplying these data to the Government is minimal.

Estimated Price - Group IV items should normally be shown on the DD Form 1423 at no cost.

Item 18. For each data item, enter an amount equal to that portion of the total price which is estimated to be attributable to the production or development for the Government of that item of data. These estimated data prices shall be developed only from those costs which will be incurred as a direct result of the requirement to supply the data, over and above those costs which would otherwise be incurred in performance of the contract if no data were required. The estimated data prices shall not include any amount for rights in data. The Government's right to use the data shall be governed by the pertinent provisions of the contract.

DATA ITEM DESCRIPTION			Form Approved OMB No. 0704-0188	
2. TITLE STATUS REPORT		1. IDENTIFICATION NUMBER DI-MGMT- 80368		
3. DESCRIPTION/PURPOSE 3.1 The Status Report documents the status of contractor effort towards achieving contract objectives. It identifies accomplishments to date and difficulties encountered, and compares the status achieved to planned goals and the resources expended. It is used by the Government to monitor and evaluate contractor performance.				
4. APPROVAL DATE (YYMMDD) 870608	5. OFFICE OF PRIMARY RESPONSIBILITY (OPR) G/T213	6a. DTIC APPLICABLE	6b. GIDEP APPLICABLE	
7. APPLICATION/INTERRELATIONSHIP 7.1 This data item description (DID) contains the format and content preparation instructions for the data product generated by the specific and discrete task requirement as delineated in the contract. 7.2 It is not intended that all the requirements herein should be applied to every program. Portions of this DID are subject to tailoring by deletion depending on the specific status reporting requirements of the project. (Continued on Page 2)				
8. APPROVAL LIMITATION		9a. APPLICABLE FORMS	9b. AMSC NUMBER G4130	
10. PREPARATION INSTRUCTIONS 10.1 <u>Format</u> . The Status Report may be in contractor format. 10.1.1 <u>Identification</u> . The data indicated below shall be contained on a title page or on the first page of the report. a. Title/identification of the system/component/program/project. b. Type of report (e.g., monthly, interim, final). c. Period covered by the report. d. Contract number. e. Preparing activity or contractor's title. f. Security classification, when required. g. Distribution Statement 10.1.2 <u>Page size</u> . The report shall be on 8 1/2 by 11 inch (metric A4) paper. 10.2 <u>Content</u> . The report shall contain the following: 10.2.1 <u>Summary</u> . The summary shall include a brief statement of the overall project status, covering the accomplished technical activities and development, objectives of efforts, summary results of efforts, identification of major problems/deficiencies with impact, and recommended solutions. 10.2.2 <u>Body of report</u> . The Status Report shall contain the following items, where applicable: (Continued on Page 2)				
11. DISTRIBUTION STATEMENT DISTRIBUTION STATEMENT A: Approved for public release; distribution is unlimited.				

Block 7, Application/Interrelationship (Continued)

7.3 This DID is related to DI-FNCL-80331, Funds and Man-Hour Expenditure Report which can be used in conjunction with this report if Block 10 paragraph 10.2.2.3 below is deleted.

7.4 This data item description supersedes DI-A-5004A, DI-A-5008A, DI-A-5028, and DI-E-5039B.

Block 10, Preparation Instructions (Continued)

10.2.2.1 Milestone/task status. The status of each milestone/task as defined by the statement of work or contract, as applicable:

a. A statement as to whether or not the program/project/task is on schedule; if not, the effort planned to meet the schedule shall be indicated. Include an overall status of each milestone, task, or unit of work. Include updated schedule sheets, milestone charts, or task synopsis sheets identifying phase of task and percentage of completion of each task, technical instruction, or order.

b. A comparison of achieved end-product performance capabilities projected against contract baseline values, requirements, or allocations.

c. Effort expended on each task to date, and a brief description of technical developments and accomplishments.

d. Key dates in any testing program and a description of tests performed and significant test results. If applicable, a description of the amount and type of down time on the equipment or system under test.

e. A list of all designs completed and a brief description of each item. For designs in process, provide estimated dates for design and drawing completion.

f. A narrative of outstanding problems existing as of the previous status report, and their resolution status.

g. New problem areas encountered or anticipated, their effect on the overall work effort/project, and steps being taken to remedy problem situations.

h. Significant results of conferences, trips, or directives from the Contracting officer's representatives.

i. Any other information which may cause significant changes in the program schedule.

10.2.2.2 Future plans. Summary of future plans, recommendations and proposals both for the next reporting period and for any long term plans.

10.2.2.3 Itemized man-hours and costs. Itemized man-hour and cost expenditure incurred for the reporting period by category and task, total contractual expenditures, and funds remaining as of the reporting date.

Block 10, Preparation Instructions (Continued)

10.2.2.4 Contract deliveries status. The status of each deliverable end item, including data deliveries, as required by the contract. Provide item and contract identification, shipping/transmittal data, acceptance status, security classification, and scheduled due date information.

10.2.2.5 Report preparer. Name of person(s) preparing report and telephone number(s).

10.2.3 Appendices. Appendices, where applicable, for tables, references, charts, or other descriptive material. Each appendix shall be identified and referenced in the appropriate area of the report.